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9/20/99

Rick Breitenbach Assistant Director CalFed 1416 9th St. #1155 Sacramento, CA 95814

RE: CalFed Comments

Mr. Brietenbach:

The final California Unified Watershed Assessment of October 1998 listed the Napa River as a Category I Impaired Priority Watershed with one of the highest percentages in the state of endangered and threatened plant and animal species.

Water diversions are discussed in the CalFed Program as a stressor to the ecosystem on page 427-Volume I of the Ecosystem Restoration Plan. In the Introductory statement a list of watershed effects is given, "...fish, aquatic organisms, sediment, streamflow, habitat, foodweb productivity and species abundance and distribution." We would add increased salinity. In the first paragraph of the Stressor Description it is stated: "In some cases, diversions on a tributary stream remove so much flow during summer and fall that little or no flow remains in the stream."

The remainder of this section on the water diversion issue seems to focus on dams or "high impact diversions" and the solution to the problem seems to be fish screens.

In the Napa River Watershed there are hundreds of diversions; there is no way of knowing how many. The State Department of Water Resources tells us they do not have these plotted. Water diversions are permitted by the DWR without knowing the attributes of the tributary or the cumulative effect of all the diversions on the same stream. The Napa River and its tributaries are smaller than the major river systems in the program like the Sacramento so the accumulation of all of these small water diversions may have just as detrimental an effect as a dam on a large river.

The Napa River is 50 miles long with 47 tributaries, 17 miles of the river from the San Pablo Bay to the City of Napa is estuarine. Almost all of the tributaries supported a healthy steelhead and salmon population in the 1800's.

Solutions for the Napa River Watershed and others would be that the permitting process by the DWR includes:

- 1. A site visit by staff.
- 2. Data on the amount of total water diverted on a tributary.
- 3. A habitat assessment.
- 4. Data on the fish that have historically spawned in that stream and current counts.

We feel that it is only fair that such a process take place when water is being taken away from those that live downstream.

Thank-you

Judith Sears

Friends of the Napa River